REMARKS

Applicants would like to thank the Examiner for the careful consideration and substantive effort given this case.

The Examiner has rejected claims 1-3, 5-9, 12-22 and 24-28 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Number 5,721,827 to *Logan et al.* in view of U.S. Patent Number 5,311,175 to *Waldman et al.* Applicants respectfully traverse this rejection in light of the following remarks.

Independent claims 1, 12 and 18 incorporate features not disclosed in the prior art cited by the Examiner. In particular, the Examiner-cited prior art does not teach or suggest a tactile user interface that is adapted to be operated by a print-disabled individual such that when activated, the interface causes the audio output to announce information corresponding to content in the database as required by claims 1, 12 and 18. The amendments set forth above in these claims find support at various sections of the detailed description, including but not limited to paragraphs [0071] and [0025].

The Examiner correctly states that Logan et al. does not teach a tactile user interface adapted to be operated by a print-disabled individual. The Examiner further states that "Waldman teaches a method of pre-identification of keys on a keypad using tactile information which is of value to a visually impaired individual." However, the Applicants note that Waldman et al. merely teaches providing information about a key that is pressed by a user. Waldman et al. does this by "naming the touched key audibly via [a] speech synthesizer." Waldman et al., col. 6, ll. 26-27.

Thus, the keypad of Waldman et al. does not effectively help a print-disabled user navigate through a database of content, as its audio output relates to the keys, not the content itself. Indeed, the combination of Logan et al. and Waldman et al. does not teach or suggest a

tactile user interface that, when activated, causes an audio output to announce information pertaining to the content. Accordingly, for at least this reason, claims 1, 12 and 18 are allowable over the prior art cited by the Examiner.

Moreover, independent claim 25 incorporates features not disclosed in the prior art cited by the Examiner. In particular, neither *Logan et al.* nor *Waldman et al.* teaches or suggests a user interface for a portable electronic device having a navigation controls that elicits auditory information pertaining to at least one individual document when selected, as required by claim 25. Such information may include, for example, a document title, a table of contents heading, or content of the document itself. The amendment to claim 25 finds support at various sections of the detailed description, including but not limited to paragraphs [0071] and [0025].

As stated above, Logan et al. does not teach a tactile interface adapted to be operated by a print-disabled individual. Furthermore, Waldman et al. merely teaches providing information about a key that is pressed by a user. Waldman et al. does this by "naming the touched key audibly via [a] speech synthesizer." Waldman et al., col. 6, ll. 26-27. Waldman et al. does not teach an interface that elicits auditory information pertaining to at least one individual document when selected, as required by claim. Thus, the combination of Logan et al. and Waldman et al. does not and cannot teach this feature, either. Rather, the combination of Logan et al. and Waldman et al. merely teaches an audio output that identifies which key is pressed. For at least these reasons, claim 25 is allowable over the prior art cited by the Examiner.

As claims 2, 3 and 5-9 depend from and incorporate all of the limitations of allowable independent claim 1, claims 2, 3 and 5-9 are likewise allowable over the prior art. As claims 13-17 depend from and incorporate all of the limitations of allowable independent claim 12, claims 13-17 are likewise allowable over the prior art. As claims 19-22 and 24 depend from and

incorporate all of the limitations of allowable independent claim 18, claims 19-22 and 24 are likewise allowable over the prior art. As claims 26-28 depend from and incorporate all of the limitations of allowable independent claim 25, claims 26-28 are likewise allowable over the prior art.

Applicants note that the Examiner has rejected claims 4 and 11 under 35 U.S.C. §103(a) as being unpatentable over *Logan et al.* in view of *Waldman et al.* and further in view of *Kiraly et al. Kiraly et al.* does not resolve the deficiencies of *Logan et al.* and *Waldman et al. Kiraly et al.* merely teaches an "alpha-numeric input device 114" and a "cursor control device 116." Neither of these devices is adapted to be operated by a print-disabled individual as required by claim 1. Since claims 4 and 11 depend from and incorporate all of the limitations of claim 1, claims 4 and 11 are likewise allowable over the prior art.

The Examiner has also rejected claim 10 under 35 U.S.C. §103(a) as being unpatentable over Logan et al. in view of Waldman et al. and further in view of U.S. Patent Number 6,122,617 to Tjaden. Tjaden does not resolve the deficiencies of Logan et al. and Waldman et al. Tjaden merely teaches a "keyboard 60." Nothing in Tjaden teaches that the keyboard is adapted to be operated by a print-disabled individual as required by claim 1. Thus, since claim 10 depends from and incorporates all of the limitations of claim 1, claim 10 is likewise allowable over the prior art.

The Examiner has rejected claim 23 under 35 U.S.C. §103(a) as being unpatentable over Logan et al. in view of Waldman et al. and further in view of U.S. Patent Number 6,055,566 to Kikinis. Kikinis does not resolve the deficiencies of Logan et al. or Waldman et al. Kikinis does not teach any particular user interface. Thus, nothing in Kikinis teaches a user interface that is adapted to be operated by a print-disabled individual as required by claim 18. Accordingly,

since claim 23 depends from and incorporates all of the limitations of claim 18, claim 23 is likewise allowable over the prior art.

All of the stated grounds of objection and rejection have been properly traversed, accommodated or rendered moot. Applicants therefore respectfully request that the Examiner reconsider and withdraw all presently outstanding objections and rejections. There being no other rejections, Applicants respectfully request that the current application be allowed and passed to issue.

In order to expedite prosecution of this Application, if the Examiner does not consider all of the presently presented claims to be allowable, the Applicants hereby request the opportunity for an interview with the Examiner. I invite the Examiner to telephone or e-mail me directly to schedule the interview if necessary.

AUTHORIZATION

The Commissioner is hereby authorized to charge any additional fees which may be required for this Amendment and Response, or credit any overpayment, to deposit account no. 50-0436.

Respectfully submitted, PEPPER HAMILTON LLP

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Facsimile: 412.281.0717 Date: June 13, 2005